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August 29, 2007

Ref: EPR-N

Dave Roberts, Management Assistant  
National Park Service  
Curecanti Resource Protection Study Comments  
2465 South Townsend Ave.  
Montrose, CO 81401

RE: Draft Resource Protection Study /  
Environmental Impact Statement for the  
Curecanti National Recreation Area  
CEQ#: 20070306

Dear Mr. Roberts:

In accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Resource Protection Study and Environmental Impact Statement (DEIS) for the Curecanti National Recreation Area (NRA) in Colorado.

The Curecanti NRA currently includes 41,790 acres of land in Gunnison and Montrose Counties. The area stretches along 40 miles of the Gunnison River basin and includes land areas adjacent to the Wayne Aspinall Storage Unit of the Colorado River Storage Project.

The DEIS presents a description of the proposed action to officially establish Curecanti NRA and associated Conservation Opportunity Areas (COAs), add additional land area to the unit, and provide the National Park Service with long-term management tools and authorities. The new NRA would include 51,830 acres with an additional 24,300 acres of private property designated as a COA. EPA notes that the proposal, presented as Preferred Alternative 2, represents clear environmental benefits compared to the No Action Alternative. EPA recognizes the commitment to cooperative conservation with local landowners as an innovative approach that will provide for the conservation of the considerable natural, cultural, recreational and aesthetic values in the area. We concur that the net impact would be to limit development and conserve resources.

EPA believes that certain aspects of the Preferred Alternative merit additional clarification and analysis. The most substantive concern is the lack of any reference to potential environmental impacts associated with increased recreational access and use of lands in the proposed NRA/COA. EPA specifically recommends that the DEIS consider the potential impacts of increased recreational use in areas that are made more accessible by this proposal.

This is especially significant for those land units (CO 92, Gunnison River, Iola Basin, and Sapinero/Blue Mesa) that have been identified as COAs based on their recreational value.

While EPA appreciates that a specific assessment of the impacts of individual recreational activities is not within the scope of this DEIS, we believe that the discussion of the Preferred Alternative's potential environmental consequences should acknowledge that uses (day hiking, backcountry camping, horseback riding, cross-country skiing, fishing, hunting, boating and other water-based recreation, rock climbing, off-road vehicle use and additional activities outlined as potential uses on pages 103-104) could present localized impacts to resources. The designation of biking or horse trails in areas within the proposed NRA/COA boundary that are currently not accessible, for example, would pose a potential for increased erosion, water quality degradation and wildlife impacts. Other recreational activities would pose their own unique set of potential impacts to natural resources. In addition, amenities such as parking lots, campsites and restroom facilities represent additional potential indirect impacts.

Considering the concerns outlined above, EPA recommends that Chapter 4's treatment of Environmental Consequences for Natural Resources include references to potential impacts associated with increased recreational access and uses associated with the Preferred Alternative. Similarly, Table 5 in Chapter 2, "Summary of Environmental Consequences" should include language on potential adverse impacts associated with increased use of specific COA units. While these DEIS sections may characterize recreation-related impacts as minor or moderately adverse, and may also cite management plans and measures that can and/or will be employed to mitigate impacts, EPA believes that the document should clearly disclose that increased recreational use that occurs as a result of this proposal may present impacts to water quality, vegetation, wildlife communities, special status species and other resources.

EPA also notes that ten tracts, encompassing 1,243 acres, have been identified for potential deletion from the NRA under the Preferred Alternative. While we understand that some of these tracts will be used to secure the conservation of other high-value resources on properties within the proposed COA, we were unable to find detailed information on the basis for the deletion of these properties in the DEIS (Chapter 2, page 50). We recommend that the Final EIS include some information on the criteria and rationale used to determine the tracts subject to potential deletion.

While addressing the comments above would improve the Final EIS, EPA believes that this project offers a clear set of environmental benefits when compared to the status quo. EPA is rating the Proposed Action as an LO. "LO" (lack of objections) signifies that EPA's review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative.

EPA recognizes this DEIS and Resource Protection Study as a response to a request by Congress to assess the natural, cultural, recreational, and scenic resource value and character of the land within and surrounding Curecanti NRA, to identify practicable alternatives that protect

those values, and recommend economically feasible and viable tools to achieve resource protection goals. EPA understands and expects that specific management plans and actions, including measures that will mitigate impacts associated with increased recreational use, will follow if the NRA is expanded and a COA is created as envisioned.

Thank you for the opportunity to review the Draft Resource Protection Study and Environmental Impact Statement for Curecanti National Recreation Area. If you would like to discuss EPA's comments, or any other issues related to the review of the DEIS, the most knowledgeable person on my staff is Rich Mylott, who can be reached at 303-312-6654.

Sincerely,

/s/ Deborah Lebow  
for Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and  
Remediation

Enclosure